



ATTORNEYS AND COUNSELORS AT LAW

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March 3, 2006

VIA E-FILING & HAND DELIVERY

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station  
Boston, MA 02110

Re: D.T.E. 05-61; Milford Water Company

Dear Ms. Cottrell:

Enclosed for filing please find Milford Water Company's responses to the Information Requests of the Town of Milford set forth on the attached list.

Any questions on this matter should be directed to the undersigned.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Eric J. Krathwohl", written over a circular stamp or seal.

Eric J. Krathwohl

Encl.

cc: Shaela McNulty Collins, Esq., Hearing Officer –Settlement Intervention Staff  
John Geary, Esq., Hearing Officer – Adjudicatory Staff  
Gerald M. Moody, Esq.  
Henry C. Papuga, Manager  
Stephen B. Alcott

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**RICH MAY, A PROFESSIONAL CORPORATION**

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**Responses to Information Requests:**

Town 1-9

Town 1-10

Town 1-19

Town 1-30

Town 1-35

Town 1-40

Town 1-43

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**MILFORD WATER COMPANY RESPONSES TO THE  
FIRST SET OF INFORMATION REQUESTS OF THE  
TOWN OF MILFORD  
D.T.E. 05-61**

Respondent: Henry C. Papuga  
Response Date: March 3, 2006

Town 1-9      Please list by position and annualized rate of pay each full or part time employee employed by the company during calendar year 2003 and calendar year 2004.

**Response:**      **Attached is a listing of full time and part time employees employed by the company in 2003 and 2004 including position, hourly rate at year end and W2 wages.**

| 2003 COMPANY EMPLOYEES |                             |              |              |           |           |                               |           |
|------------------------|-----------------------------|--------------|--------------|-----------|-----------|-------------------------------|-----------|
| Name                   | Position                    | Date of hire | Termin. date | Full time | Part time | \$ hourly rate at yr end/term | W-2 wages |
| FSA                    | pump station operator       | 11/17/1969   |              | X         |           | 19.94                         | 50,089.13 |
| RJB                    | foreman/backhoe op.         | 10/26/1964   |              | X         |           | 19.30                         | 41,778.70 |
| MAB                    | summer help - laborer       | 7/7/2003     |              |           | X         | 10.00                         | 4,255.00  |
| DC                     | senior office CSR/billing   | 4/6/1959     |              | X         |           | 16.82                         | 35,506.42 |
| RLL                    | bookkeeper                  | 2/3/2003     |              | X         |           | 17.83                         | 34,272.78 |
| RDL                    | meter reader                | 10/26/1984   |              | X         |           | 16.00                         | 33,627.70 |
| KPK                    | water sys technician        | 7/6/1999     |              | X         |           | 15.00                         | 34,257.67 |
| HCP                    | manager                     | 1/3/1983     |              | X         |           | 35.22                         | 74,104.00 |
| LPS                    | office CSR/billing          | 11/27/2000   |              | X         |           | 13.28                         | 27,757.68 |
| JHP                    | water sys technician        | 7/19/1999    |              | X         |           | 14.70                         | 34,672.20 |
| HMJ                    | water sys tech/backhoe op   | 10/20/1986   |              | X         |           | 20.36                         | 52,065.66 |
| KMH                    | office CSR/billing          | 5/19/2003    |              | X         |           | 15.00                         | 17,022.00 |
| DEH                    | treatment plant operator    | 6/9/2003     |              | X         |           | 16.00                         | 18,632.00 |
| JHIII                  | water sys tech/backhoe op   | 6/2/2003     |              | X         |           | 15.00                         | 18,146.25 |
| RPL                    | water sys tech/meter reader | 11/2/1987    |              | X         |           | 18.22                         | 39,767.10 |

| 2004 COMPANY EMPLOYEES |                                |              |              |           |           |                               |           |
|------------------------|--------------------------------|--------------|--------------|-----------|-----------|-------------------------------|-----------|
| Name                   | Position                       | Date of hire | Termin. date | Full time | Part time | \$ hourly rate at yr end/term | W-2 wages |
| FSA                    | pump station operator          | 11/17/1969   |              | X         |           | 20.44                         | 50,527.99 |
| RJB                    | foreman/backhoe op.            | 10/26/1964   | 2/2/2004     | X         |           | 19.30                         | 7,131.35  |
| MAB                    | summer help - laborer          | 7/7/2003     | 7/21/2004    |           | X         | 10.00                         | 1,930.00  |
| DC                     | senior office CSR/billing      | 4/6/1959     |              | X         |           | 17.24                         | 35,970.59 |
| RLL                    | bookkeeper                     | 2/3/2003     |              | X         |           | 18.84                         | 38,808.58 |
| RDL                    | meter reader                   | 10/26/1984   |              | X         |           | 16.48                         | 33,868.80 |
| KPK                    | water sys tech/treatment pl op | 7/6/1999     |              | X         |           | 17.48                         | 38,282.64 |
| HCP                    | manager                        | 1/3/1983     |              | X         |           | 36.28                         | 74,699.20 |
| LPS                    | office CSR/billing             | 11/27/2000   | 2/20/2004    | X         |           | 13.28                         | 5,312.00  |
| KED                    | summer help -office            | 6/4/2004     | 8/20/2004    |           | X         | 10.00                         | 3,707.50  |
| KMM                    | office CSR/billing             | 8/30/2004    |              | X         |           | 15.00                         | 10,323.75 |
| JHP                    | water sys technician           | 7/19/1999    |              | X         |           | 16.48                         | 38,118.69 |
| HMJ                    | water sys tech/foreman/back op | 10/20/1986   |              | X         |           | 20.96                         | 53,582.44 |
| KMH                    | office CSR/billing             | 5/19/2003    | 12/7/2004    | X         |           | 15.90                         | 24,087.85 |
| DEH                    | treatment plant operator       | 6/9/2003     | 8/14/2004    | X         |           | 17.50                         | 25,236.15 |
| JHIII                  | water sys tech/backhoe op      | 6/2/2003     | 3/26/2004    | X         |           | 15.00                         | 8,208.75  |
| RPL                    | water sys tech/meter reader    | 11/2/1987    |              | X         |           | 18.68                         | 39,084.45 |
| CS                     | water sys tech/backhoe op      | 10/25/2004   |              | X         |           | 16.00                         | 5,772.00  |
| SS                     | water sys technician           | 6/14/2004    |              | X         |           | 16.00                         | 17,680.76 |

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D.T.E. 05-61**

Respondent: Henry C. Papuga  
Response Date: March 3, 2006

Town 1-10 Please state what salary increases were granted, and when, for each employee position from April 1, 1999 through the present.

**Response: The Company grants pay increases effective May 1<sup>st</sup> of each year (subject to review and change by the president). Attached is a listing of employees of the company that were employed as of 12/31/2004 (end of the test year) and the percentage granted to each employee. The Company will provide evidence of the approval of the pay increases effective May 1, 2006 when that occurs. As shown in Mr. Alcott's schedules, a 3% overall increase is expected and budgeted.**



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**Response Date:** March 3, 2006

**Town 1-19** During the years 2000 through 2004, did the Milford Water Company enter into any contracts or other financial arrangements with the R.H. White Construction Company and/or any companies affiliated with that company or other companies owned or controlled by Leonard White or members of his family, and if so, please identify:

- a. The nature of the contract.
- b. The amount paid by Milford Water Company.
- c. The identity of the affiliated company.

**Response:** Please refer to the Company's response to information request SIS 1-30.

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Town 1-30 Has the Company prepared (directly or though an independent consultant) a comprehensive supply and/or demand management study for its system since the last rate case? If so, please provide a copy. If not, why not? Is one currently ongoing or planned to be started soon?

**Response:** For many years the Company has recognized the need to develop additional sources of supply to meet the short term and long term development needs within the community. Considerable resources have been allocated. A number of consultants have been engaged to study the problem and recommend an appropriate solution strategy. In addition to these studies the company independently developed alternate solutions and attempted to solve the company's problem through a local and expanded regional approach. The most comprehensive study and report was prepared by Metcalf & Eddy entitled "Final Report to: Milford Water Company Milford, Massachusetts - Water Master Plan and Analysis of Reservoir Yield" March 1997. A copy was provided to Settlement Intervention Staff and the Town on March 2, 2006. This is a very voluminous document and additional copies will be provided upon request.



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Town 1-35 What has the average use per residential customer been for each of the last 5 years (1999-2004)?

**Response: The average use per residential customer for the last 5 years (1999-2004) is listed below:**

|             | <b>Total annual<br/>residential<br/><u>usage (cu ft)</u></b> | <b>Total #<br/>residential<br/><u>customers</u></b> | <b>Avg annual<br/>residential<br/><u>usage (cu ft)</u></b> |
|-------------|--|---|--|
| <b>1999</b> | <b>82,509,249</b>  | <b>7423</b>   | <b>11,115</b>  |
| <b>2000</b> | <b>74,724,900</b>  | <b>7504</b>   | <b>9,958</b>   |
| <b>2001</b> | <b>79,316,847</b>  | <b>7577</b>   | <b>10,468</b>  |
| <b>2002</b> | <b>74,414,210</b>  | <b>7673</b>   | <b>9,698</b>   |
| <b>2003</b> | <b>74,820,885</b>  | <b>7707</b>   | <b>9,708</b>   |
| <b>2004</b> | <b>75,348,880</b>  | <b>7856</b>   | <b>9,591</b>   |

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Town 1-40      What were the corresponding consumption levels in each of the preceeding three years (2001-2003)?

**Response:**      The consumption levels by customer class that produced revenues to the company for 2001, 2002 and 2003 are listed below:

| <b>Customer<br/>class</b>      | <b><u>2001</u></b> | <b>Volume (cu.ft.)<br/><u>2002</u></b> | <b><u>2003</u></b> |
|--------------------------------|--------------------|--|--------------------|
| <b>Residential</b>             | <b>79,316,847</b>  | <b>74,414,210</b>                      | <b>74,820,885</b>  |
| <b>Commercial</b>              | <b>21,608,200</b>  | <b>20,495,400</b>                      | <b>24,376,500</b>  |
| <b>Industrial</b>              | <b>20,175,300</b>  | <b>12,711,200</b>                      | <b>15,591,500</b>  |
| <b>Municipal/Institutional</b> | <b>3,904,300</b>   | <b>3,915,100</b>                       | <b>3,873,900</b>   |
| <b>Other towns</b>             | <b>5,657,800</b>   | <b>6,783,700</b>                       | <b>6,321,445</b>   |

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Town 1-43      Please provide an update as to when Hopedale's new well supply will be on-line and supplanting 100% of the wholesale purchases from Milford. Is there any possibility that Hopedale will continue to make significant wholesale purchases going forward for another year or two?

**Response:**      On March 2, 2006 the Town of Milford provided a letter from the water system manager for the Town of Hopedale (Mr. Watson), in which Mr. Watson characterized Hopedale's new supply as a "new source" that remains years away from providing water service. The Company's only knowledge is not consistent with such letter. Please see the Company's response to information request SIS 1-1. In the December 2005 conversation with Mr. Watson that is referenced in the Company's response to SIS 1-1, Mr. Watson referenced the new supply as a "replacement" of Hopedale's existing well, as differentiated from a "new source" for regulatory purposes that would entail significantly greater work and a longer timeframe for implementation. In such conversation, Mr. Papuga asked Mr. Watson for an update on the status of the replacement but has received no such response.

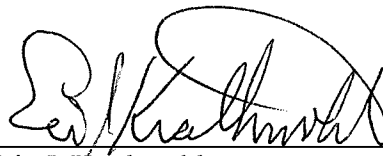
COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS  
AND ENERGY

D.T.E. 05-61

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding in accordance with the requirements of 220 CMR 1.05(1) (Department's Rules of Practice and Procedure).

Dated at Boston, Massachusetts this 3<sup>rd</sup> day of March, 2006.

A handwritten signature in black ink, appearing to read "Eric J. Krathwohl", is written over a horizontal line.

Eric J. Krathwohl  
Counsel

Of Counsel for  
Milford Water Company